

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

The Woodlands Pride, Inc.; Abilene
Pride Alliance; Extragrams, LLC; 360
Queen Entertainment LLC; Brigitte
Bandit,

Plaintiffs,

v.

Civil Action No. 4:23-cv-02847

Angela Colmenero, in an official
capacity as Interim Attorney General of
Texas; The Woodlands Township;
Montgomery County, Texas; Brett
Ligon, in an official capacity as District
Attorney of Montgomery County; City
of Abilene, Texas; Taylor County,
Texas; James Hicks, in an official
capacity as District Attorney of Taylor
County; Delia Garza, in an official
capacity as County Attorney of Travis
County; Joe D. Gonzalez, in an official
capacity as District Attorney of Bexar
County,

Defendants.

DECLARATION OF BRIGITTE BANDIT

Pursuant to 28 U.S.C. § 1746, Brigitte Bandit declares:

1. My name is Brigitte Bandit.¹ I am over twenty-one (21) years of age and am fully competent to testify about the matters contained herein. The following statements are made within my personal knowledge and are true and correct.

2. I am a resident of Travis County, Texas. I am seeking leave to proceed under a pseudonym to protect my safety and privacy.

3. In June 2023, my legal name was exposed on the internet by an anti-LGBTQIA+ hate group. On their website and social media, this group posted photos and video of me, taken out of context, and exposed my legal name. They also lied and said that I perform “sexually explicit drag shows in front of children” and am “a well-known advocate for child sexualization.” This group linked to my Twitter account and urged their followers to send me hateful messages. The things they said about me are false and have had an awful impact on my life.

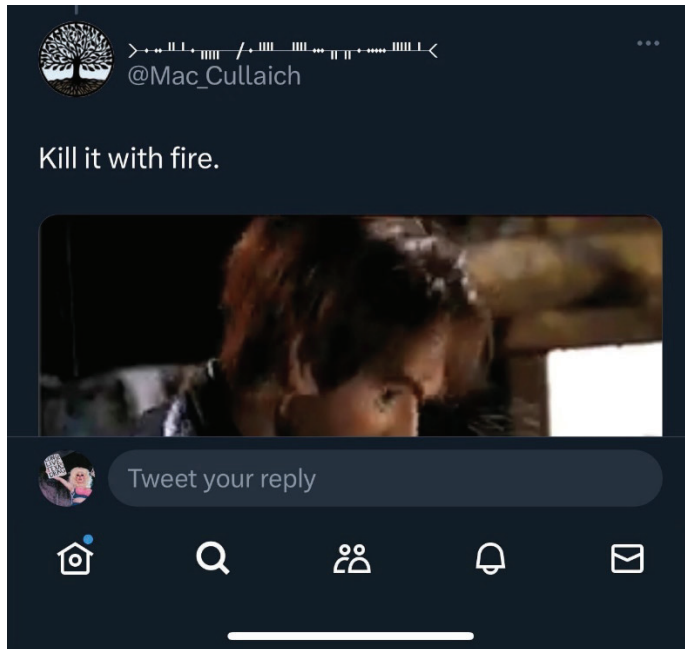
4. Since that incident, I have been targeted by people on the internet who have encouraged their followers to bother or harass me. People have called me a “deviant who doesn’t belong with [sic] 500 feet of any children” and said things like “I think groomers should be a little afraid”; “They should be terrified”; “You

¹ Brigitte Bandit is a pseudonym and I am seeking leave to proceed under a pseudonym via the Motion that this declaration supports.

can run but you cannot hide”; and “Kill it with fire.” Someone also posted a picture of someone throwing a cinderblock with the words “COME HERE” on top of it.

5. The images below are a sample of the messages I received, which I would be able to testify about if called upon to do so.





6. Since SB 12 passed, I have become much more worried about my personal safety at in-person events. I get nervous walking to and from my car before and after shows and have had strangers on the street shake their head at me and frown in disapproval. I used to like to get ready in full drag at home, but now I wait until I get to the venue because I am too nervous to walk in public wearing full drag. Multiple venues have already cancelled my events recently due to anti-drag animus and threats. For the events that haven't been cancelled, venues have hired additional security due to the threats they were receiving, especially for any event where people under 18 are or might be present.

7. Since filing this lawsuit, I have had to change the privacy settings on my social media accounts because of the increase in messages of vitriol and hatred that I have received.

8. I worry that if my legal name is required to be published on the Court's docket, I could face even more threats and harassment, and it would be easier for people to search for my location or physical address if they intend to commit violence against me.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this the 15th day of August, 2023.

A handwritten signature in black ink, appearing to read "Brigitte Bandit", written in a cursive style.

Brigitte Bandit